

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MOHAMMED ALMUTTAN (1),

Defendants.

No. 4:17-CR0234 RLW/DDN

**MOTION TO MODIFY CONDITIONS OF RELEASE**

Comes now Defendant Mohammed Almuttan, by and through his attorneys, Neil J. Bruntrager and Daniel J. Bruntrager, and hereby files his Motion to Modify the Conditions of Release. In support thereof, Defendant states as follows:

1. Defendant was charged by way of Indictment with Conspiracy to Traffic in Contraband Cigarettes, Conspiracy to Distribute Controlled Substances and Analogues, Trafficking in Contraband Cigarettes, Conspiracy to Money Launder, and Money Laundering.
2. On June 22, 2017, an Order Setting Conditions of Release was issued imposing standard conditions of release including supervision by U.S. Pretrial Services and surrender of any passport. The Court also ordered home detention with electronic monitoring by global positioning system tracking.
3. A condition of Defendant's bond is that the Defendant must make a request 48 hours in advance prior to any movement or travel outside of their home or business. Defendant owns, operates and maintains several businesses around

the St. Louis Metropolitan area. This is Defendant's only source of income.

Since being placed on pre-trial release, the restrictions on traveling have made it difficult to maintain the busy work schedule of a business owner and have made it impossible to respond to any emergencies at any of the stores.

4. Defendant has been under these strict guidelines since the time the bond was ordered. Defendant has complied with pre-trial release regarding communication with their pre-trial officer, in particular in regards to travel relating to business and to even visit their attorneys.
5. Defendant requests that this Court modify the condition of release and downgrade his bond conditions from home detention with electronic monitoring by global positioning system tracking to daily check-ins with the pre-trial officer and removal of the global positioning system tracking.
6. Defendant understands that pre-trial officers are concerned with Defendant's connections to foreign states, particularly Palestine. However, it should be noted that the pre-trial officers are currently are in possession of Defendant's passport. Defendant does not seek to have his passport returned at this time.
7. Defendant has been compliant with the conditions of his existing bond.

WHEREFORE, for the foregoing reasons, Defendant, by and through counsel, respectfully requests this Court entering an Order consistent with the instant motion.

BRUNTRAGER & BILLINGS, P.C.

/s/ Neil J. Bruntrager  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of March 2018, the foregoing **Motion to Modify Conditions of Release** was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Neil J. Bruntrager